

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SHANE HAWLEY ,

Plaintiff,

v.

NEIL A BROOME; WORLD WRESTLING  
ENTERTAINMENT, INC.; EVENT  
SERVICES, INC.; NEP BROADCASTING,  
LLC; NEP BROADCASTING, LLC d/b/a NEP  
SCREENWORKS and/or SCREENWORKS  
NEP; SCREENWORKS, LLC; and NEP  
SUPERSHOOTERS, LP,

Defendants.

No. 2:11-cv-1916-TSZ

ANSWER AND AFFIRMATIVE  
DEFENSES OF WORLD  
WRESTLING ENTERTAINMENT,  
INC. AND EVENT SERVICES, INC.  
AND JURY DEMAND

WORLD WRESTLING ENTERTAINMENT, INC. and EVENT SERVICES, INC.

demand a jury pursuant to FRCP 38(b) and Answer Plaintiff's Complaint as follows:

1. The allegations of paragraphs 1.1 through 3.5 are denied for lack of knowledge or information sufficient to form a belief about the truth of the allegations.

2. For answer to the allegations of paragraphs 3.6 and 3.7, defendants admit they are corporations with the principal place of business in Connecticut and qualified to do business in the State of Washington; and the remaining allegations are denied.

ANSWER, AFFIRMATIVE DEFENSES AND  
JURY DEMAND No. 2:11-cv-1916-TSZ - 1

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BY WAY OF FURTHER ANSWER, and without admitting any matters previously denied, defendants allege the following affirmative defenses:

2. Plaintiff has failed to mitigate his damages, if any, by failing to protect himself from avoidable consequences.

4. Pursuant to RCW 4.22 et seq., and the laws of the State of Washington, these answering defendants are entitled to an allocation of fault and a determination of the proportionate share of all persons and/or entities causing damages for which recovery is sought.

5. That the conduct by defendant alleged to be negligent was not performed by any agent of defendant but by an independent contractor.

PRAYER FOR RELIEF

WHEREFORE, having answered plaintiff's complaint, defendants pray for judgment as follows:

(A) That plaintiff's complaint be dismissed with prejudice;

(B) For reasonable attorney's fees and taxable costs incurred in defending this cause;

and,

(C) For such other relief as this court may deem just and equitable.

DATED this 12<sup>th</sup> day of December, 2011.

**SCHEDLER BOND, PLLC**

By \_\_\_\_\_/s\_\_\_\_\_  
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